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July 15, 2015

VIA ECF ONLY

Magistrate Judge Robert M. Levy
U.S. District Courthouse
Courtroom 11B S
225 Cadman Plaza East
Brooklyn, NY 11201

RE: *Soto v. Application Research, Inc. d/b/a TenantAlert.com*
U.S. District Court, Eastern District of New York (Brooklyn)
Case No: 1:14-cv-07399-NG-RML

Dear Judge Levy:

Plaintiff Marisol Soto ("Plaintiff") and Defendant Application Research, Inc. ("Application Research") respectfully request leave for their respective counsel to participate by telephone at the upcoming Initial Status Conference scheduled for July 22, 2015 at 3:45 p.m.

Good cause exists to grant this request as Plaintiff's lead counsel will be required to travel from Philadelphia, Pennsylvania to Brooklyn, New York and Application Research's counsel will be required to travel from Zionsville, Indiana to Brooklyn, New York and thus, Plaintiff and Application Research will incur significant travel costs and attorneys' fees for their respective counsel to participate in the conference in person.

Further, counsel for Plaintiff and Application Research assures the Court that each can and will meaningfully participate by telephone in all respects as may be necessary

Respectfully,

SCHUCKIT & ASSOCIATES, P.C.

/s/ Camille R. Nicodemus

Camille R. Nicodemus, Esq. (NY# 2807451)
Counsel for Defendant, Application Research, Inc.

FRANCIS AND MAILMAN

/s/ Greg Gorski (with consent)

Greg Gorski, Esq.
(*admitted pro hac vice*)
Counsel for Plaintiff